Food and Drug Administration
Center for Drug Evaluation and Research

Summary Minutes of the Psychopharmacologic Drugs Advisory Committee Meeting
September 16, 2010

Topic: The committee discussed the available safety and efficacy data for supplemental new drug application (sNDA) 21-897/015, VIVITROL (naltrexone for extended-release injectable suspension) sponsored by Alkermes, Inc., for the treatment of opioid dependence.

These summary minutes for the September 16, 2010 Psychopharmacologic Drugs Advisory Committee meeting were approved on September 22, 2010.

I certify that I attended the September 16, 2010 Psychopharmacologic Drugs Advisory Committee meeting and that these minutes accurately reflect what transpired.

/s/
Yvette Waples, Pharm.D.
(Designated Federal Official)

/s/
Susan K. Schultz, M.D.
(Acting Chair)

Summary Minutes of the Psychopharmacologic Drugs Advisory Committee Meeting
September 16, 2010

The following is the final report of the Psychopharmacologic Drugs Advisory Committee meeting held on September 16, 2010. A verbatim transcript will be available in approximately six weeks, sent to the Division and posted on the FDA website at http://www.fda.gov/AdvisoryCommittees/CommitteesMeetingMaterials/Drugs/PsychopharmacologicDrugsAdvisoryCommittee/ucm221387.htm

All external requests for the meeting transcripts should be submitted to the CDER Freedom of Information Office.

The Psychopharmacologic Drugs Advisory Committee of the Food and Drug Administration, Center for Drug Evaluation and Research, met on September 16, 2010, at the FDA White Oak Campus, the Great Room, 10903 New Hampshire Avenue, Bldg. 31, White Oak Conference Center, Silver Spring, Maryland. Prior to the meeting, the members and temporary voting members were provided the background materials from the FDA and Alkermes, Inc. The meeting was called to order by Susan K. Schultz, M.D. (Acting Chair); the conflict of interest statement was read into the record by Yvette Waples, Pharm.D. (Designated Federal Official). There were approximately 100 people in attendance. There were nine Open Public Hearing (OPH) speakers.

Issue: The committee discussed the available safety and efficacy data for supplemental new drug application (sNDA) 21-897/015, VIVITROL (naltrexone for extended-release injectable suspension) sponsored by Alkermes, Inc., for the treatment of opioid dependence.

Attendance:
Psychopharmacologic Drugs Advisory Committee members present:
Michael Y. Hwang, M.D.; Tonya Jo Hanson White, M.D.; Robert F. Woolson, Ph.D., William Z. Potter, M.D., Ph.D. ***(non-voting industry representative)***

Psychopharmacologic Drugs Advisory Committee members not present:
Robert W. Buchanan, M.D.; Gail W. Griffith, M.L.S.; Matthew J. Byerly, M.D.; Helen L. Egger, M.D.; Daniel R. Weinberger, M.D.

Temporary Voting Members: Louis E. Baxter, Sr., M.D., FASAM; Edward Covington, M.D.; Richard Denisco, M.D., M.P.H.; Jane C. Maxwell, Ph.D.; Edward Michna, M.D., J.D.; Ivan D. Montoya, M.D., M.P.H.; Rodney Mullins (Consumer Representative); Susan K. Schultz, M.D. (Acting Chair); Sharon L. Walsh, Ph.D.; Chung-yui Betty Tai, Ph.D.

FDA Participants: Bob Rappaport, M.D.; Robert O'Neill, M.D.; Celia Winchell, M.D.; Rigoberto Roca, M.D.

Open Public Hearing Speakers:
Terry Shaffer; Thomas Voller; Kimberly Simpson; Bobby Coffey (Board Member of Faces and Voices of Recovery); Percy Menzies, M.Pharm (President, Assisted Recovery Center of America, LLC); Christine Mack; Michael Fishman, M.D. (Talbot Recovery Campus); Thomas J. Berger, Ph.D. (Executive Director, Veterans Health Council, Vietnam Veterans of America); Laura M. Gallbreath, MPP (Director of Health Integration and Wellness Promotion, National Council for Community Behavioral Healthcare).

The agenda was as follows:

Call to Order Introduction of Committee	**Susan Schultz, M.D.** Acting Chair Psychopharmacologic Drugs Advisory Committee (PDAC)
Conflict of Interest Statement	**Yvette W. Waples, Pharm.D.** Designated Federal Official PDAC
Opening Remarks	**Celia Winchell, M.D.** Clinical Team Leader Division of Anesthesia and Analgesia Products (DAAP), Office of Drug Evaluation (ODE) II, Office of New Drugs (OND), Center for Drug Evaluation and Research (CDER) Food and Drug Administration (FDA)
SPONSOR PRESENTATION Introduction	**Elliott Ehrich, M.D**. Chief Medical Officer and Senior Vice President of Research and Development Alkermes, Inc.
Opioid Dependence and Naltrexone Overview	**Charles P. O'Brien, M.D., Ph.D.** Kenneth Appel Professor and Director of the Center for Studies of Addiction Department of Psychiatry University of Pennsylvania School of Medicine
Review of Efficacy	**Elliott Ehrich, M.D.** Alkermes, Inc.
Review of Safety	**Bernard L. Silverman, M.D.** Vice President, Clinical Science Alkermes, Inc.
We Need Treatment Options	**Paul Earley, M.D.** Addiction Medicine Physician Medical Director of the Talbott Recovery Center
Closing Remarks	**Elliott Ehrich, M.D., Alkermes, Inc.**
Clarifying Questions	

BREAK

FDA PRESENTATION

Presentation of Safety of Vivitrol For Opioid Dependence	**Rachel Skeete, M.D.** Clinical Reviewer DAAP, ODE II, OND CDER, FDA
Summary of Clinical Pharmacology of Vivitrol	**Srikanth C. Nallani, Ph.D.** Clinical Pharmacology Reviewer Office of Clinical Pharmacology Office of Translational Science (OTS) CDER, FDA
Presentation of Efficacy of Vivitrol For Opioid Dependence	**Feng Li, Ph.D.** Biostatistics Reviewer Division of Biometrics (DB) II, Office of Biostatistics (OB), OTS, CDER,FDA
Summary of Clinical Site Inspections	**Tejashri Purohit-Sheth, M.D.** Branch Chief, Good Clinical Practice II Division of Scientific Investigations Office of Compliance CDER, FDA
Dealing with Foreign Clinical Trial Data in the Review Process: Some Experience and the Role of The International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use: Ethnic Factors in the Acceptability of Foreign Clinical Data (ICH E5) Guidance	**Robert O'Neill, Ph.D.** Director, OB, OTS, CDER, FDA
Clarifying Questions	

LUNCH

Open Public Hearing

Charge to the Committee

BREAK

Panel Discussion and Questions
to the Committee

ADJOURN

Questions to the Committee:

1. Is the data from the single clinical trial sufficient to conclude that the drug is effective as a treatment for opioid dependence in the patient population that was studied? YES/NO/ABSTAIN

   YES: 11 NO: 2 ABSTAIN: 0

Committee Discussion: *The majority of the committee members agreed that the single clinical trial was well conducted and the data is sufficient to conclude that the drug is effective as a treatment for opioid dependence in the patient population that was studied. Those voting 'no' felt that a single clinical trial is not sufficient due to lack of comparable data. One member voting 'no' felt that the designation of discontinued participants as returning to opioid use represented a problem in the statistical design.*

2. Can the results observed in the studied population be applied to the US target population? YES/NO/ABSTAIN

   YES: 10 NO: 1 ABSTAIN: 2

Committee Discussion: *The majority of the committee members agreed the results observed in the studied population can be applied to the United States (US) target population due to their belief that the pharmacological efficacy would be comparable. The panel member voting 'no' had concerns regarding lack of information related to the social and psychological factors within the treatment process. Those voting to 'abstain' felt this question was difficult to answer.*

3. If the answer to question *two* is NO, what additional data are needed (i.e., types of studies)?

Committee Discussion: *Committee members voting 'no' or 'abstain' made comments that more data are needed on controlled studies comparing the efficacy between a Russian patient population and the US and/or other populations.*

4. Taking into account the indication, are the safety data adequate? YES/NO/ABSTAIN

   YES: 12 NO: 0 ABSTAIN: 1

Committee Discussion: *The majority of the committee members agreed that the safety data are adequate. One panel member abstained due to lack of clinical experience. Discussion included a concern that additional safety assessments following discontinuation may be helpful to monitor the safety of withdrawing the opioid receptor blockade.*

5. If the answer to question *four* is NO, what additional safety data are needed to support use of this product?

Committee Discussion: *There was no discussion needed.*

6. Should this supplement for treatment for opioid dependence be approved? YES/NO/ABSTAIN

   YES: 12 NO: 1 ABSTAIN: 0

   Committee Discussion: *The majority of the committee members agreed that VIVITROL® (naltrexone for extended-release injectable suspension) should be approved for the treatment of opioid dependence. The committee member voting 'no' felt that a single clinical trial is not sufficient.*

The meeting was adjourned at approximately 4:40 p.m.